

1 Rene L. Valladares
2 Federal Public Defender
3 Nevada State Bar No. 11479
4 Aden Kebede
5 Assistant Federal Public Defender
6 Nevada State Bar No. 15581
7 411 E. Bonneville, Ste. 250
8 Las Vegas, Nevada 89101
9 (702) 388-6577
10 Aden_Kebede@fd.org

11 Attorney for Mikaela Cuevas

12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11 United States of America,
12
13 Plaintiff,
14
15 v.
16 Mikaela Cuevas
17
18 Defendants.

Case No. 2:19-cr-00321-APG-VCF

**Stipulation to Continue
Revocation Hearing (Third
Request)**

17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher
18 Chiou, Acting United States Attorney, and Simon Kung, Assistant United States
19 Attorney, counsel for the United States of America, and Rene L. Valladares,
20 Federal Public Defender, and Aden Kebede, Assistant Federal Public Defender,
21 counsel for Mikaela Cuevas, that the Revocation Hearing currently scheduled on
22 January 19, 2022 at 9:30 am, be vacated and continued to a date and time
23 convenient to the Court, but no sooner than 90 days.

24 This Stipulation is entered into for the following reasons:

25 1. The supervised release petition and its addendum alleges a new
26 violation which is pending in state court. The alleged new law violation is the
subject of a pending state case. A preliminary hearing in state court is scheduled

1 for February 22, 2022. As a result, the parties seek a continuance to allow Ms.
2 Cuevas to attend the state court proceedings and to further allow the state court
3 matter to proceed before resolving the related matter in this case.

4 2. Ms. Cuevas is nearly eight months pregnant, and her delivery date is
5 set for March 28, 2022. Defense requests additional time to allow her to give birth
6 before tending to this revocation proceeding.

7 4. The defendant is not in custody and agrees with the need for the
8 continuance.

9 5. The parties agree to the continuance.

10
11 This is the third request for a continuance of the revocation hearing.

12 DATED: January 14, 2022.

13 Rene L. Valladares
14 Federal Public Defender

Christopher Chiou
Acting United States Attorney

15 */s/Aden Kebede*
16 By _____
17 Aden Kebede
Assistant Federal Public Defender

/s/ Simon Kung
By _____
Simon Kung
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA
3
4

5 United States of America,
6 Plaintiff,
7 v.
8 Mikaela Cuevas
9 Defendant.
10

Case No. 2:19-cr-00321-APG-VCF

**Order Granting Third Stipulation
to Continue Revocation Hearing**

11
12 Based on the stipulation of counsel, the Court finds that good cause exists
13 to continue the revocation hearing.

14 IT IS THEREFORE ORDERED that the revocation hearing currently
15 scheduled for January 19, 2022, at 9:30 a.m. is vacated and continued to May 3,
16 2022, at 10:00 a.m. in Courtroom 6C.

17 DATED: January 18, 2022.

18 

19 _____
20 Andrew P. Gordon
21 United States District Judge
22
23
24
25
26